

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

J.A. CASTRO,	§	
Plaintiff,	§	
	§	
VS.	§	Case No. 4:23-cv-00613-P-BJ
	§	
JOHN DOE 1 (a.k.a. “CHETSFORD”), et al.	§	
Defendants,	§	

**MOTION TO RECONSIDER BY DEFENDANT
JOHN DOE 1 (“Chetsford”)**

Defendant John Doe 1, aka Chetsford, moves for reconsideration of this Court’s electronic order, docketed on September 19, 2023, granting Plaintiff leave to take early discovery concerning the identity of John Doe 1 (Doc. 21).¹ John Doe 1 further moves that, upon reconsideration, this Court vacate said order and deny Plaintiff’s motion for early discovery.

Respectfully submitted,

/s/ Anne Marie Mackin

Anne Marie Mackin
Texas Bar No. 24078898
The Gober Group

¹ John Doe 1 appears here by counsel, as anonymous defendants not infrequently do in similar circumstances. *E.g.*, *Art of Living Foundation v. Does 1-10*, 2011 U.S. Dist. LEXIS 129836, at *4 (N.D. Cal. Nov. 9, 2011); *Sandoval v. Doe*, 591 F. Supp. 3d 7, 9 (E.D.N.C. 2022). John Doe 1 appears solely for the purpose of challenging the Court’s September 19 Order on the ground that the Court lacks subject matter jurisdiction. John Doe 1 has not been served with process, and does not waive but instead expressly reserves the right to assert any defense or argument in the future, including without limitation jurisdictional defenses and arguments.

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Attorneys for John Doe 1 (Chetsford)

Certificate of Conference

Pursuant to Local Rule 7.1(a), I hereby certify that on October 3, 2023, I conferred with Plaintiff regarding this motion via email, and Plaintiff indicated that he is OPPOSED to this motion.

Respectfully submitted,

/s/ Anne Marie Mackin
Anne Marie Mackin
Texas Bar No. 24078898
Attorney for John Doe 1 (Chetsford)